

Filed in U.S. Bankruptcy Court  
Atlanta, Georgia  
M. Regina Thomas, Clerk

JUL 16 2021



UNITED STATES BANKRUPTCY COURT OF GEORGIA  
NORTHERN DISTRICT

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)  
CASSANDRA JOHNSON-LANDRY )  
DEBTOR )

BRC 18-55697 LRC

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**SUBMISSION: AMENDED OBJECTION TO CLAIM NUMBER 2 BUREAUS  
INVESTMENT GROUP PORTFOLIO NO LLC 15 (21500842).**

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CASSANDRA JOHNSON-LANDRY, DEBTOR SUBMITS AMENDED OBJECTION TO CLAIM  
NUMBER 2 BUREAUS INVESTMENT GROUP PORTFOLIO NO LLC 15 (21500842).

ADDITIONAL DOCUMENTS WERE SUBMITTED AFTER INITIAL CLAIM WAS FILED IN  
ADDITION TO UPDATED PROOF OF CLAIM FORM. PROOF OF CLAIM WAS SUBMITTED ON  
4/25/2018 WITH THE SAME CLAIM NUMBER OF 21500842.

THIS CLAIM APPEARS TO BE THE CLAIM FAILED ON 2/28/2019. DEBTOR REQUEST  
DISALLOWANCE OF CLAIM DUE TO DUPLICATE CLAIM BEING FILED. NEITHER APPEAR  
TO BE VALIDATED. APPEARED FALSE FILING. (EXHIBIT A).

16<sup>TH</sup> OF JULY 2021

CASSANDRA JOHNSON-LANDRY

CASSANDRA JOHNSON-LANDRY, PRO SE

UNITED STATES BANKRUPTCY COURT OF GEORGIA  
NORTHERN DISTRICT  
CERTIFICATE OF SERVICE

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I, CASSANDRA JOHNSON-LANDRY, DEBTOR CURRENTLY SUBMITS: AMENDED  
OBJECTION TO CLAIM NUMBER 2 BUREAUS INVESTMENT GROUP PORTFOLIO  
NO LLC 15 (21500842).). DEBTOR IS OVER THE AGE OF 18 YEARS. AMENDED  
OBJECTION TO CLAIM 21 SUBMITTED BY USPS VIA FIRST CLASS MAIL ON 16<sup>TH</sup> OF  
JULY 2021.

CHI PHAN  
BANKRUPTCY CLERK  
PRA RECEIVABLES MANAGEMENT LLC.  
P.O. BOX 41021  
NORFOLK VA 23541

HERBERT C. BROADFOOT II  
2964 PEACHTREE ROAD, NW.  
SUITE 555  
ATLANTA, GA 30305

S. GREGORY HAYS  
2964 PEACHTREE ROAD, NW.  
SUITE 555  
ATLANTA, GA 30305

16<sup>TH</sup> OF JULY 2021

CASSANDRA JOHNSON-LANDRY  
CASSANDRA JOHNSON-LANDRY, PRO SE

## **EXHIBIT A**

## Northern District of Georgia Claims Register

18-55697-lrc Cassandra Johnson Landry **Converted** 09/14/2018

**Judge:** Lisa Ritchey Craig

**Chapter:** 7

**Office:** Atlanta

**Last Date to file claims:**

**Trustee:** S. Gregory Hays

**Last Date to file (Govt):** 09/30/2018

<b>Creditor:</b> (21484451) The Downs Homeowners Association, Inc. c/o Lazega & Johanson, LLC P.O. Box 250800 Atlanta, Georgia 30325	<b>Claim No: 1</b> <i>Original Filed</i> Date: 04/18/2018 <i>Original Entered</i> Date: 04/18/2018	<b>Status:</b> <i>Filed by:</i> CR <i>Entered by:</i> Bradley W. Griffin <i>Modified:</i>												
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 10%;">Amount</td> <td style="width: 10%;">claimed:</td> <td style="width: 20%;">\$2911.35</td> <td style="width: 10%;"></td> <td style="width: 10%;"></td> <td style="width: 10%;"></td> </tr> <tr> <td>Secured</td> <td>claimed:</td> <td>\$2911.35</td> <td></td> <td></td> <td></td> </tr> </table>			Amount	claimed:	\$2911.35				Secured	claimed:	\$2911.35			
Amount	claimed:	\$2911.35												
Secured	claimed:	\$2911.35												
<b>History:</b> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 10%;"><b>Details</b></td> <td style="width: 5%;"><input checked="" type="radio"/></td> <td style="width: 10%;">1-1</td> <td style="width: 15%;">04/18/2018</td> <td style="width: 60%;">Claim #1 filed by The Downs Homeowners Association, Inc., Amount claimed: \$2911.35 (Griffin, Bradley)</td> </tr> </table>			<b>Details</b>	<input checked="" type="radio"/>	1-1	04/18/2018	Claim #1 filed by The Downs Homeowners Association, Inc., Amount claimed: \$2911.35 (Griffin, Bradley)							
<b>Details</b>	<input checked="" type="radio"/>	1-1	04/18/2018	Claim #1 filed by The Downs Homeowners Association, Inc., Amount claimed: \$2911.35 (Griffin, Bradley)										
<b>Description:</b> (1-1) Proof of Claim and Backup														
<b>Remarks:</b>														

<b>Creditor:</b> (21500842) Bureaus Investment Group Portfolio No 15 LLC c/o PRA Receivables Management, LLC PO Box 41021 Norfolk VA 23541	<b>Claim No: 2</b> <i>Original Filed</i> Date: 04/25/2018 <i>Original Entered</i> Date: 04/25/2018	<b>Status:</b> <i>Filed by:</i> CR <i>Entered by:</i> PRA Receivables Management, LLC <i>Modified:</i>						
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 10%;">Amount</td> <td style="width: 10%;">claimed:</td> <td style="width: 20%;">\$13719.40</td> <td style="width: 10%;"></td> <td style="width: 10%;"></td> <td style="width: 10%;"></td> </tr> </table>			Amount	claimed:	\$13719.40			
Amount	claimed:	\$13719.40						
<b>History:</b> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 10%;"><b>Details</b></td> <td style="width: 5%;"><input checked="" type="radio"/></td> <td style="width: 10%;">2-1</td> <td style="width: 15%;">04/25/2018</td> <td style="width: 60%;">Claim #2 filed by Bureaus Investment Group Portfolio No 15 LLC, Amount claimed: \$13719.40 (PRA Receivables Management, LLC)</td> </tr> </table>			<b>Details</b>	<input checked="" type="radio"/>	2-1	04/25/2018	Claim #2 filed by Bureaus Investment Group Portfolio No 15 LLC, Amount claimed: \$13719.40 (PRA Receivables Management, LLC)	
<b>Details</b>	<input checked="" type="radio"/>	2-1	04/25/2018	Claim #2 filed by Bureaus Investment Group Portfolio No 15 LLC, Amount claimed: \$13719.40 (PRA Receivables Management, LLC)				
<b>Description:</b>								
<b>Remarks:</b> (2-1) CAPITAL ONE, N.A.								

<b>Creditor:</b> (21457005) <u>History</u> Valeri Burnough Delong Caldwell Bridgers Fitzpatrick & Benjamin 101 Marietta St, NW, Suite 3100	<b>Claim No: 3</b> <i>Original Filed</i> Date: 04/27/2018 <i>Original Entered</i> Date: 04/27/2018	<b>Status:</b> <i>Filed by:</i> CR <i>Entered by:</i> Charles R. Bridgers <i>Modified:</i>
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Amount	claimed:	\$2049.87		
Secured	claimed:	\$2049.87		
<b>History:</b>				
Details	19-1	06/13/2018	Claim #19 filed by Natchez Trace Homeowners Association, Inc., Amount claimed: \$2049.87 (Coulter, G.)	
	336	02/03/2021	Order DENYING Motion to Disallow Claim (Objection to Claim) No. 19 of Natchez Trace Homeowners Association, Inc. (Related Doc # 173) Service by BNC.. Entered on 2/3/2021. (law)	
<b>Description:</b>				
<b>Remarks:</b>				

<b>Creditor:</b> (21829075) Georgia Department of Community Health 2 Peachtree Street, NW 40th Floor Atlanta, GA 30303	<b>Claim No: 20</b> <i>Original Filed</i> Date: 09/19/2018 <i>Original Entered</i> Date: 09/19/2018	<b>Status:</b> <i>Filed by:</i> CR <i>Entered by:</i> Whitney W. Groff <i>Modified:</i>		
Amount	claimed:	\$42634.37		
<b>History:</b>				
Details	20-1	09/19/2018	Claim #20 filed by Georgia Department of Community Health, Amount claimed: \$42634.37 (Groff, Whitney)	
<b>Description:</b> (20-1) Medicaid Claims Adjustments and Audit Finding; Manual 1-106 L&M				
<b>Remarks:</b>				

<b>Creditor:</b> (21500842) Bureaus Investment Group Portfolio No 15 LLC c/o PRA Receivables Management, LLC PO Box 41021 Norfolk VA 23541	<b>Claim No: 21</b> <i>Original Filed</i> Date: 02/28/2019 <i>Original Entered</i> Date: 02/28/2019	<b>Status:</b> <i>Filed by:</i> CR <i>Entered by:</i> PRA Receivables Management, LLC <i>Modified:</i>		
Amount	claimed:	\$10389.98		
<b>History:</b>				
Details	21-1	02/28/2019	Claim #21 filed by Bureaus Investment Group Portfolio No 15 LLC, Amount claimed: \$10389.98 (PRA Receivables Management, LLC)	
	392	06/22/2021	Order If Debtor files amended objections that state claims, corrects the servicedeficiencies, and files certificates of service evidencing proper service on or before July 16, 2021, the Court will schedule such objections for hearing. (Objection to Claim) No. 13, 21 of Bureaus Investment Group Portfolio no 15, LLC (Related Doc # 371, 372) Service by BNC.. Entered on 6/22/2021. (law)	
<b>Description:</b>				
<b>Remarks:</b> (21-1) CAPITAL ONE, N.A.				

## Fill in this information to identify the case:

Debtor 1 CASSANDRA JOHNSON LANDRY

Debtor 2 \_\_\_\_\_  
(Spouse, if filing)

United States Bankruptcy Court for the: Northern District of Georgia  
(State)

Case number 18-55697-LRC

## Official Form 410

## Proof of Claim

04/16

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

## Part 1: Identify the Claim

1. Who is the current creditor?	<u>Bureaus Investment Group Portfolio No 15 LLC</u> Name of the current creditor (the person or entity to be paid for this claim) Other names the creditor used with the debtor <u>CAPITAL ONE, N.A.</u>	
2. Has this claim been acquired from someone else?	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes. From whom? <u>Capital One</u>	
3. Where should notices and payments to the creditor be sent?  Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	Where should notices to the creditor be sent?  <u>Bureaus Investment Group Portfolio No 15 LLC</u> <u>c/o PRA Receivables Management, LLC</u> Name <u>PO Box 41021</u> Number Street <u>Norfolk</u> <u>VA</u> <u>23541</u> City State ZIP Code Contact phone <u>(877)829-8298</u> Contact email <u>claims@recoverycorp.com</u> Uniform claim identifier for electronic payments in chapter 13 (if you use one): _____	Where should payments to the creditor be sent? (if different)  <u>Bureaus Investment Group Portfolio No 15 LLC</u> <u>c/o PRA Receivables Management, LLC</u> Name <u>PO Box 41031</u> Number Street <u>Norfolk</u> <u>VA</u> <u>23541</u> City State ZIP Code Contact phone <u>(877)829-8298</u> Contact email <u>claims@recoverycorp.com</u>
4. Does this claim amend one already filed?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) _____ Filed on _____ MM / DD / YYYY	
5. Do you know if anyone else has filed a proof of claim for this claim?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing? _____	

3800046172 - 15847524

**Part 2: Give Information About the Claim as of the Date the Case Was Filed**

6. Do you have any number you use to identify the debtor?	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: <u>2508</u>
7. How much is the claim?	\$ <u>13,719.40</u> Does this amount include interest or other charges? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).
8. What is the basis of the claim?	Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card. Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c). Limit disclosing information that is entitled to privacy, such as health care information. <u>Credit Card</u>
9. Is all or part of the claim secured?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. The claim is secured by a lien on property.  <b>Nature of property:</b> <input type="checkbox"/> Real estate. If the claim is secured by the debtor's principal residence, file a <i>Mortgage Proof of Claim Attachment</i> (Official Form 410-A) with this <i>Proof of Claim</i> . <input type="checkbox"/> Motor vehicle <input type="checkbox"/> Other. Describe: _____  <b>Basis for perfection:</b> _____ Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)  <b>Value of property:</b> \$ _____ <b>Amount of the claim that is secured:</b> \$ _____ <b>Amount of the claim that is unsecured:</b> \$ _____ (The sum of the secured and unsecured amounts should match the amount in line 7.)  <b>Amount necessary to cure any default as of the date of the petition:</b> \$ _____  <b>Annual Interest Rate (when case was filed)</b> _____ % <input type="checkbox"/> Fixed <input type="checkbox"/> Variable
10. Is this claim based on a lease?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Amount necessary to cure any default as of the date of the petition. \$ _____
11. Is this claim subject to a right of setoff?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Identify the property: _____

## 12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?

A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority.

☒ No☐ Yes. Check all that apply:☐ Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).

Amount entitled to priority

\$ \_\_\_\_\_

☐ Up to \$2,850\* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).

\$ \_\_\_\_\_

☐ Wages, salaries, or commissions (up to \$12,850\*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4).

\$ \_\_\_\_\_

☐ Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).

\$ \_\_\_\_\_

☐ Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).

\$ \_\_\_\_\_

☐ Other. Specify subsection of 11 U.S.C. § 507(a)( ) that applies.

\$ \_\_\_\_\_

\* Amounts are subject to adjustment on 4/01/19 and every 3 years after that for cases begun on or after the date of adjustment.

**Part 3: Sign Below**

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

☐ I am the creditor.☒ I am the creditor's attorney or authorized agent.☐ I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.☐ I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date 4/25/2018  
MM / DD / YYYY

/s/ Chi Phan

Signature

Print the name of the person who is completing and signing this claim:

Name	Chi	Phan
	First name	Middle name Last name
Title	Bankruptcy Clerk	
Company	PRA Receivables Management, LLC	
	Identify the corporate servicer as the company if the authorized agent is a servicer.	
Address	PO Box 41021	
	Number	Street
	Norfolk	VA 23541
	City	State ZIP Code
Contact phone	(877)829-8298	Email claims@recoverycorp.com



**Bankruptcy Rule 3001(c)(2)(A) Statement\*****Itemize the interest, fees, expenses, and charges incurred before the petition date.\*\***

Description	Amount
1. Principal	(1) <u>\$13,719.40</u>
2. Interest	(2) <u>\$0.00</u>
3. Fees	(3) <u>\$0.00</u>
4. Expenses	(4) <u>\$0.00</u>
5. Charges	(5) <u>\$0.00</u>
6. Total prepetition principal, interest, fees, expenses, and charges. Add all of the amounts listed above.	(6) <u>\$13,719.40</u>

**Bankruptcy Rule 3001(c)(3)(A) Statement\***

Description	Response
1. Name of the entity from whom the creditor purchased the account	(1) Capital One
2. Name of the entity to whom the debt was owed at the time of the account holder's last transaction on the account	(2) Unable to determine. (Original creditor is CAPITAL ONE, N.A.)
3. Date of the account holder's last transaction	(3) 6/16/2015
4. Date of the Last Payment on the Account	(4) 3/31/2018
5. Date on which the account was charged to profit and loss	(5) 8/31/2016

Obligor(s):

CASSANDRA JOHNSON LANDRY

In the September 2010 Committee on Rules of Practice and Procedure Report to the Judicial Conference of the United States, the Committee acknowledged that "under federal record retention policies for financial institutions, credit card records generally need to be retained for only two (2) years. Furthermore, account information is usually stored in an electronic format, and it may not be practicable to reproduce a duplicate of an account statement."

\* The claimant expressly reserves its right to amend or supplement this statement and/or the proof of claim to which it attaches in any respect.

\*\* All information concerning this account is based on records and documentation provided by Bureaus Investment Group Portfolio No 15 LLC to PRA Receivables Management, LLC. To request additional information or documentation with respect to the statement and/or proof of claim to which it attaches, please contact a claim specialist at (877) 829-8298 or at [claims@recoverycorp.com](mailto:claims@recoverycorp.com). Some documents may no longer be available, or may have been lost or destroyed.

10/3/2017

<https://www.freecreditreport.com/c/#/print/experian/201710031621501417>

24355697-landry - Experian  
Date of Report: Oct 3, 2017



A.

THE BUREAU INC  
415505XXX

Closed

## ACCOUNT DETAILS

*Fraud*

Account Name THE BUREAU INC

Account # 415505XXX

Original Creditor CAPITAL ONE N.A.

Company Sold -

Account Type Collection Department / Agency / Attorney

Date Opened Sep 1, 2016

Account Status Closed

Payment Status Seriously past due date / assigned to attorney, collection agency, or credit grantor's internal collection department

Status Updated Oct 1, 2016

Balance \$14,019

Balance Updated Sep 19, 2017

Original Balance 14119

Monthly Payment -

Past Due \$14,019

Amount -

Highest Balance -

Term 1 Month

Responsibility Individual

Your Statement -

Comments -

## CONTACT INFORMATION

1717 CENTRAL ST  
EVANSTON, IL 60201  
(800) 708-7071

## PAYMENT HISTORY

2017				2016			
Jan	Feb	Mar	Apr	Jan	Feb	Mar	Apr
FP	FP		FP				
May	Jun	Jul	Aug	May	Jun	Jul	Aug
FP	FP	FP	FP				
Sep	Oct	Nov	Dec	Sep	Oct	Nov	Dec
FP					FP	FP	

Summary

Accounts

Collections

Inquiries

Public Records

Credit Score

10/3/2017

<https://www.freecreditreport.com/c/#/print/experian/201710031621501417>

CA:SSA V DRA LANDRY - Experian  
Date of Report: Oct 3, 2017



THE BUREAUS INC  
415505XXX

Closed

#### ACCOUNT DETAILS

*Fraud*

Account Name THE BUREAUS INC  
Account # 415505XXX  
Original Creditor CAPITAL ONE N.A.  
Company Sold  
Account Type Collection Department / Agency / Attorney  
Date Opened Sep 1, 2016  
Account Status Closed  
Payment Status Seriously past due date / assigned to attorney, collection agency, or credit grantor's internal collection department  
Status Updated Oct 1, 2016  
Balance \$10,689  
Balance Updated Sep 19, 2017  
Original Balance 10790  
Monthly Payment  
Past Due Amount \$10,689  
Highest Balance  
Terms 1 Month  
Responsibility Individual  
Your Statement  
Comments

#### CONTACT INFORMATION

1717 CENTRAL ST  
EVANSTON, IL 60201  
(800) 708-7071

#### PAYMENT HISTORY

2017				2016			
Jan	Feb	Mar	Apr	Jan	Feb	Mar	Apr
FP	FP		FP				
May	Jun	Jul	Aug	May	Jun	Jul	Aug
FP	FP	FP	FP				
Sep	Oct	Nov	Dec	Sep	Oct	Nov	Dec
FP					FP	FP	

Summary Accounts Collections Inquiries Public Records Credit Score